

LAW OFFICES OF
GERALD B. LEFCOURT, P.C.
A PROFESSIONAL CORPORATION
1776 BROADWAY, SUITE 2000
NEW YORK, N.Y. 10019

GERALD B. LEFCOURT
lefcourt@lefcourtlaw.com

TELEPHONE
(212) 737-0400
FACSIMILE
(212) 988-6192

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SHERYL E. REICH
reich@lefcourtlaw.com
FAITH A. FRIEDMAN
ffriedman@lefcourtlaw.com

October 29, 2021

VIA ECF

Honorable J. Paul Oetken
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

United States v. Kukushkin, et al. 19 CR. 725 (JPO)

Dear Judge Oetken:

We are counsel to Andrey Kukushkin in the above matter. We respectfully write on behalf of all parties (Messrs. Parnas, Kukushkin, and the government) regarding a briefing schedule for the defense's post-trial motions pursuant to Rules 29 and 33 of the Federal Rules of Criminal Procedure. The parties have conferred and jointly propose the following schedule:

- Rule 29 and 33 motions due on or before December 9, 2021;
- Responses due on or before December 23, 2021; and
- Replies due on or before January 13, 2022.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Gerald B. Lefcourt
Gerald B. Lefcourt

cc: All counsel (via ecf)